

LOEB & LOEB LLP

Schuyler G. Carroll

Stephen A. Aschettino

Daniel B. Besikof

Noah Weingarten

345 Park Avenue

New York, NY 10154

Tel: (212) 407-4000

Fax: (212) 407-4990

Email: scarroll@loeb.com

saschettino@loeb.com

dbesikof@loeb.com

nweingarten@loeb.com

*Proposed Counsel to the Debtors
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

)	Chapter 11
)	
)	Case No. 19-76260
In re:)	Case No. 19-76263
)	Case No. 19-76267
Absolut Facilities Management, LLC, <i>et al.</i>)	Case No. 19-76268
)	Case No. 19-76269
Debtors. ¹)	Case No. 19-76270
)	Case No. 19-76271
)	Case No. 19-76272
)	
)	(Jointly Administered)

**NOTICE OF AGENDA FOR HEARING ON OCTOBER 3, 2019 AT 1:30 P.M.
(EASTERN TIME), BEFORE THE HONORABLE ALAN S. TRUST AT THE UNITED
STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF NEW YORK,
AT COURTROOM 960, 290 FEDERAL PLAZA, CENTRAL ISLIP, NEW YORK, 11722**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Absolut Facilities Management, LLC (1412); Absolut Center for Nursing and Rehabilitation at Allegany, LLC (7875); Absolut Center for Nursing and Rehabilitation at Aurora Park, LLC (8266); Absolut Center for Nursing and Rehabilitation at Gasport, LLC (8080); Absolut at Orchard Brooke, LLC (1641); Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC (8300); Absolut Center for Nursing and Rehabilitation at Three Rivers, LLC (8133); and Absolut Center for Nursing and Rehabilitation at Westfield, LLC (7924).

1. Case Management Conference (Dkt. No. 50)
2. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Financing; (II) Granting Liens and Superpriority Claims to Postpetition Lender; and (III) Scheduling Final Hearing (Dkt. No. 4)

Related Documents:

- A. Declarations of Michael Wyse (Dkt. Nos. 15 & 57)
- B. Letters from Schuyler Carroll Providing Notice of First Day and Continued Hearing on Certain First Day Motions (Dkt. Nos. 21 & 33)
- C. Landlord's Preliminary Objection (Dkt. No. 30)
- D. Landlord's Supplemental Objection (Dkt. No. 39)
- E. Debtors' Omnibus Response to Landlord's Preliminary and Supplemental Objections (Dkt. No. 40)
- F. Capital Finance's Objection (Dkt. No. 60)
- G. Capital Funding's Objection (Dkt. No. 70)
- H. Landlord's Notice of Unresolved Objection to Proposed Form of DIP Financing Order (Dkt. No. 74)
- I. DIP Lender's Response to Landlord's Notice of Unresolved Objection (Dkt. No. 76)
- J. Letter from Schuyler Carroll Uploading Proposed Order (Dkt. No. 80)
- K. Capital Funding's Amended Objection (Dkt. No. 95)

Status: This matter is going forward.

3. Debtors' Emergency Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors (Dkt. No. 10)

Related Documents:

- A. Declarations of Michael Wyse (Dkt. Nos. 15 & 57)
- B. Debtors' Emergency Motion to Redact Critical Vendors Motion (Dkt. No. 18)
- C. Letters from Schuyler Carroll Providing Notice of First Day and Continued Hearing on Certain First Day Motions (Dkt. Nos. 21 & 33)
- D. Order Sealing Critical Vendors Motion (Dkt. No. 22)
- E. Redacted Version of the Critical Vendors Motion (Dkt. No. 24)
- F. Landlord's Objection (Dkt. No. 39)

Status: This matter is going forward.

4. Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Using their Cash Management System and (B) Maintain Existing Bank Accounts and Business Forms; (II) Waiving Certain Deposit Guidelines and (III) Granting Related Relief (Dkt. No. 11)

Related Documents:

- A. Declarations of Michael Wyse (Dkt. Nos. 15 & 57)
- B. Letters from Schuyler Carroll Providing Notice of First Day and Continued Hearing on Certain First Day Motions (Dkt. Nos. 21 & 33)

Status: This matter is going forward.

5. Motion for Entry of An Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered Into Prepetition, (B) Pay and Satisfy Prepetition Obligations Related thereto, Including Broker Fees and Premium Financing Obligations; and (II) Granting Related Relief (Dkt. No. 12)

Related Documents:

- A. Declarations of Michael Wyse (Dkt. Nos. 15 & 57)
- B. Letters from Schuyler Carroll Providing Notice of First Day and Continued Hearing on Certain First Day Motions (Dkt. Nos. 21 & 33)
- C. Landlord's Objection (Dkt. No. 39)
- D. Letter from Schuyler Carroll Uploading Proposed Order (Dkt. No. 80)

Status: This matter is going forward.

6. Motion for Entry of Order Approving the Debtors' Plan of Closure for Orchard Park Facility (Dkt. No. 51)

Related Documents:

- A. Supplemental Declaration of Michael Wyse (Dkt. No. 20)
- B. 6060 Armor Group's Application for a Temporary Restraining Order (Dkt. Nos. 55 & 56)
- C. Capital Finance's Joinder to Application for a Temporary Restraining Order (Dkt. No. 58)
- D. Capital Finance's Objection (Dkt. No. 63)
- E. Capital Funding's Joinder to Application for a Temporary Restraining Order (Dkt. No. 67)
- F. Arba Group's Motion to Appoint Trustee or, Alternatively, an Examiner and Objection to Closure Plan Motion (Dkt. No. 69)
- G. Letter from Schuyler Carroll Enclosing the Closure Plan (Dkt. No. 83)
- H. Debtors' Omnibus Response to Trustee Motion and Objections to Closure Plan (Dkt. No. 96)
- I. Declaration of Michael Wyse (Dkt. No. 97)
- J. Declaration of William K. Lenhart (Dkt. No. 98)
- K. Declaration of Sean Doolan (Dkt. No. 99)
- L. Declaration of Israel Sherman (Dkt. No. 100)

Status: This matter is going forward.

7. Landlords' (I) Motion for Entry of an Order Appointing Chapter 11 Trustee or, Alternatively, an Examiner, Pursuant to Section 1104 and (II) Preliminary Objection to Debtors' Motion to Approve Plan of Closure for Orchard Park Facility (Dkt. No. 69)

Related Documents:

- A. Arba Group's *Ex Parte* Motion to Have Trustee Motion Heard on Shortened Time (Dk. No. 71)
- B. Order Granting Request to Have Trustee Motion Heard on Shortened Time (Dkt. No. 77)
- C. U.S. Trustee's Joinder to Trustee Motion (Dkt. No. 87)
- D. Debtors' Omnibus Response to Trustee Motion and Objections to Closure Plan (Dkt. No. 96)
- E. Declaration of Michael Wyse (Dkt. No. 97)
- F. Declaration of William K. Lenhart (Dkt. No. 98)
- G. Declaration of Sean Doolan (Dkt. No. 99)
- H. Declaration of Israel Sherman (Dkt. No. 100)

Status: This matter is going forward.

Dated: October 2, 2019
New York, New York

LOEB & LOEB LLP

/s/ Daniel B. Besikof

Schuyler G. Carroll

Stephen A. Aschettino

Daniel B. Besikof

Noah Weingarten

345 Park Avenue

New York, NY 10154

Tel: (212) 407-4000

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scarroll@loeb.com

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